

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE:	Case No. 20-51066-mar
HFV LIQUIDATING TRUST,	Chapter 11
Debtor.	Honorable Mark A. Randon

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**FIRST OMNIBUS OBJECTION OF THE HFV LIQUIDATING TRUST TO  
(A) AMENDED OR SUPERSEDED CLAIMS, (B) DUPLICATE CLAIMS,  
AND (C), CERTAIN NO LIABILITY CLAIMS**

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The HFV Liquidating Trust (the “Trust”), as successor to Henry Ford Village, Inc. (“Debtor”), pursuant to section 502 of the Bankruptcy Code, Rules 3003 and 3007 the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Rules 3007-1 and 9013-2 of the Local Rules (the “Local Bankruptcy Rules”), and that certain *Order (I) Approving Procedures for Filing Omnibus Objections to Claims, (II) Approving the Form and Manner of the Notice of Omnibus Objections, and (III) Granting Related Relief* [Docket No. 771] (the “Objection Procedures Order”),<sup>1</sup> hereby files its first omnibus objection to Claims (the “Objection”), and in support thereof, respectfully states as follows:

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<sup>1</sup> Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Objections Procedures Order.

### **Relief Requested**

1. By this first omnibus Objection, the Trust seeks an order, substantially in the form attached hereto as **Exhibit A**, (a) disallowing and expunging the Claims identified on **Schedule 1** to **Exhibit A** (collectively, the “Amended Claims”) because the Claims have been amended by subsequently filed Proofs of Claim, (b) disallowing and expunging the Claims identified on **Schedule 2** to **Exhibit A** (collectively, the “Duplicate Claims”) because they are duplicates of other Proofs of Claim filed by or on behalf of the same claimant in respect of the same liabilities, and (c) disallowing and expunging the Claims identified on **Schedule 3** to **Exhibit A** (collectively, the “No Liability Claims”) because the claims seek recovery of amount for which the Trust is not liable.

### **Jurisdiction and Venue**

2. The United States Bankruptcy Court for the Eastern District of Michigan (the “Court”) has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334.

3. Venue is proper pursuant to 28 U.S.C. §§ 1408 and 1409.

4. The bases for the relief requested herein are section 502 of title 11 of the United States Code, 11 U.S.C. §§ 101-1532 (the “Bankruptcy Code”), Rules 3003 and 3007 the Bankruptcy Rules, and Rules 3007-1 and 9013-2 of the Local Bankruptcy Rules.

### **The Claims Reconciliation Process**

5. On the Effective Date, the Trust was formed pursuant to the confirmed chapter 11 plan (the “Plan”) as the successor to the Debtor responsible for administering the Debtor’s remaining assets. One of the primary tasks the Trust must undertake in that regard is the reconciliation of Claims asserted against the Debtor’s estate to determine what Claims should be allowed and therefore entitled to distribution pursuant to the Plan.

6. To date, approximately 419 Proofs of Claim have been filed and approximately 2,592 scheduled Claims appear on the Debtor’s schedules. Because of the large number of Claims in this case, the Trust sought and has been granted approval to file omnibus objections to certain Claims in accordance with the Objection Procedures Order.

7. Prior to filing this Objection, the Trust has engaged in an extensive outreach process to certain holders of Class 2 General Unsecured Claims in an attempt to resolve any differences that became apparent in the Claims reconciliation process. In short, the Trust reached out to holders of Claims that it determined were either residents or former residents and offered to enter into consensual stipulations that voluntarily modified the Claims to match the Debtor’s schedules and provided for withdrawal of duplicative and amended Claims. As a result of this process, the Trust has entered into 60 stipulations resolving Claim disputes.

8. By this Objection, the Trust now seeks approval to disallow and expunge certain Claims for the reasons set forth below.

### **Objection**

9. Pursuant to section 502(a) of the Bankruptcy Code, a filed proof of claim is deemed allowed unless a party in interest objects thereto. *See* 11 U.S.C. § 502(a). Bankruptcy Rule 3007 provides certain grounds upon which “objections to more than one claim may be joined in an omnibus objection.” Bankruptcy Rule 3007(d). The Objection Procedures Order expands upon Bankruptcy Rule 3007(d) and permits the Trust to file an omnibus objection on additional grounds.

10. As described in Bankruptcy Rule 3001(f), a properly executed and filed proof of claim is *prima facie* evidence of the validity and the amount of the claim under Bankruptcy Code 502(a). To maintain its *prima facie* validity, however, the claimant must allege sufficient facts to support its claim. *In re McLaughlin*, 320 B.R. 661, 665 (N.D. Ohio 2005) (citing *In re Allegheny Int’l, Inc.*, 954 F.2d 167, 173-74 (3d Cir. 1992)); *see also In re Dow Corning Corp.*, 250 B.R. 298, 321 (Bankr. E.D. Mich. 2000) (observing that supporting documentation was needed for a proof of claim to valid *prima facie*). If an objection refuting at least one of the claim’s essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See, e.g., In re Central Processing Services, LLC*, 606 B.R.

712, 715 (Bankr. E.D. Mich. 2019); *Sherman v. Novak (In re Reilly)*, 245 B.R. 768, 773 (B.A.P. 2d Cir. 2000).

11. Pursuant to Bankruptcy Rule 3007 and the Objection Procedures Order, the Trust files this Objection to the Claims listed on **Schedules 1 – 3** to **Exhibit A** on the bases set forth below.

**A. Amended Claims**

12. The Trust objects to the 9 Claims listed in the column labelled “Claims to be Disallowed” on **Schedule 1** to **Exhibit A** because the Trust has determined that they have been amended and superseded by subsequently filed Proofs of Claim by the same claimant on account of the same liability. Disallowance or expungement of the Amended Claims will not affect the Claims identified in the column labelled “Surviving Claims” on **Schedule 1** to **Exhibit A**, which will remain on the claims register maintained in these chapter 11 cases (the “Claims Register”) unless withdrawn by the applicable claimants or otherwise disallowed by the Court, subject to the Trust’s right to object to such surviving Claims in the future on any grounds permitted by applicable law. Accordingly, the Trust requests that the Court disallow and expunge the Amended Claims from the Claims Register.

**B. Duplicate Claims**

13. The Trust objects to the 28 Duplicate Claims listed in the column labelled “Claims to be Disallowed” on **Schedule 2** to **Exhibit A** because the Trust

has determined that they are substantively or exactly duplicative of other Proofs of Claim filed by or on behalf of the same claimant (or a successor thereto) for the same underlying liability. Failure to disallow the Duplicate Claims may result in a double recovery to the claimants. Moreover, disallowance of these Duplicate Claims will enable the Claims Register to reflect more accurately the Claims asserted against the Trust. Disallowance or expungement of the Duplicate Claims will not affect the “Surviving Claims” listed on **Schedule 2**, which will remain on the Claims Register until withdrawn by the relevant claimants or otherwise disallowed by the Court, subject to the Trust’s right to object to the surviving Claims in the future on any grounds permitted by applicable law. Accordingly, the Trust requests that the Court disallow and expunge the Duplicate Claims from the Claims Register.

**C. No Liability Claims**

14. The Trust objects to the 55 No Liability Claims on **Schedule 3** to **Exhibit A** because the Trust has determined that the obligations asserted in the No Liability Claims seek recovery of amounts for which the Trust is not liable because the Claim is either payable by a different entity or because the Trust has already paid or otherwise satisfied the liability asserted in the Claim. The specific grounds for the finding of no liability for each No Liability Claim is included in **Schedule 3**.

15. In summary, certain Claims on **Schedule 3** are Claims that the Trust has determined are Class 1 LARA Escrow Claims (as defined by the Plan). Class 1

Claims were entitled to receive the return of a deposit held in an escrow account maintained by the Michigan Department of Licensing and Regulatory Affairs (LARA) pursuant to an order entered on June 10, 2020. The Trust understands that LARA has terminated the escrow pursuant to an order entered on January 12, 2022 and released the resident funds from the escrow. Accordingly, such Claims have been satisfied in full.

16. Certain other Claims on **Schedule 3** are Claims that the Trust has determined are Claims filed by residents of Henry Ford Village who entered into a Lease Addendum with the Purchaser. Pursuant to section 5.1 of the Plan, if a current resident executed a Lease Addendum, their Residency Agreement was deemed cured and such resident waived their right to a distribution from the Debtor's bankruptcy estate. Accordingly, the Trust asserts that it has no liability on account of such Claims.

17. Finally, certain other Claims on **Schedule 3** provide insufficient supporting documentation or seek payment for indebtedness of which the Trust has no records. The Trust has reviewed such Claims and been unable to verify that such Claims are valid. Accordingly, the Trust asserts that it is not liable for such Claims.

18. To allow these Claims to remain on the Trust's Claims Register would lead to multiple recoveries on a single Claim or allow for recovery on a Claim that

the Trust is unable to verify is valid. Moreover, elimination of such Claims will enable to the Trust to maintain a more accurate Claims Register in this case.

19. Accordingly, to prevent an unwarranted recovery by the claimants asserting the No Liability Claims to the detriment of other creditors, the Trust requests that the Court disallow and expunge the No Liability Claims from the Trust's Claim Register.

### **Notice**

20. Pursuant to the Omnibus Claim Objection Procedures, the Bankruptcy Court approved the form of notice attached hereto as **Exhibit B**. The Trust will provide (a) a customized notice of this objection to each affected claimant party set forth on each Claim subject to this Objection or their respective attorney of record, and (b) form of notice of the Objection to all entities that have filed a request for notice pursuant to Bankruptcy Rule 2002. The Trust submits that no other or further notice need be provided.

### **No Prior Request**

21. No prior request for the relief sought in this Objection has been made to this or any other court.

*[Remainder of Page Intentionally Left Blank]*

WHEREFORE, the Trust respectfully requests that the Court enter the Order granting the relief requested herein and such other relief as the Court deems appropriate under the circumstances.

Dated: June 6, 2022

Respectfully submitted,

By: /s/ Eric E. Walker

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*Counsel to HFV Liquidating Trust*

**Exhibit A**

**Proposed Order**

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE:

Case No. 20-51066-mar

HFV LIQUIDATING TRUST,

Chapter 11

Debtor.

Honorable Mark A. Randon

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**ORDER SUSTAINING FIRST OMNIBUS OBJECTION OF THE HFV  
LIQUIDATING TRUST TO (A) AMENDED OR SUPERSEDED CLAIMS,  
(B) DUPLICATE CLAIMS, AND (C), CERTAIN NO LIABILITY CLAIMS**

Upon the objection (the “Objection”) of the HFV Liquidating Trust (the “Trust”), for entry of an order (this “Order”), disallowing the Claims set forth on **Schedules 1–3** attached hereto, all as more fully set forth in the Objection; and this Court having jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334; and that this Court may enter a final order consistent with Article III of the United States Constitution; and this Court having found that venue of this proceeding and the Objection in this district is proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this Court having found that the relief requested in the Objection is in the best interests of the Trust, its creditors, and other parties in interest; and this Court having found that the Trust’s notice of the Objection and opportunity for a hearing on the Objection were appropriate under the circumstances and no other notice need be provided; and this Court having reviewed the Objection and having heard the

statements in support of the relief requested therein at a hearing before this Court (the “Hearing”); and this Court having determined that the legal and factual bases set forth in the Objection and at the Hearing establish just cause for the relief granted herein; and upon all of the proceedings had before this Court; and after due deliberation and sufficient cause appearing therefor, it is HEREBY ORDERED THAT:

1. The Objection is sustained as set forth herein.
2. The Amended Claims set forth on the attached **Schedule 1** are hereby disallowed and expunged in their entirety; *provided that* this Order will not affect the Proofs of Claim identified on **Schedule 1** attached hereto in the column titled “Remaining Claims.”
3. The Duplicate Claims set forth on the attached **Schedule 2** are hereby disallowed and expunged in their entirety; *provided that* this Order will not affect the Proofs of Claim identified on **Schedule 2** attached hereto in the column titled “Remaining Claims.”
4. The No Liability Claims set forth on **Schedule 3** are disallowed and expunged in their entirety.
5. The “Remaining Claims” on **Schedule 1 and 2** attached hereto (the “Remaining Claims”) will remain on the claims register maintained in the Debtor’s chapter 11 case (the “Claims Register”) and such Claims are neither

allowed nor disallowed at this time, subject, however, to any future objection on any basis. Nothing contained herein shall constitute, nor shall it be deemed to constitute, the allowance of any of the Remaining Claims.

6. Each Objection by the Trust to each Claim addressed in the Objection and as identified in **Schedules 1–3** constitutes a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order shall be deemed a separate order with respect to each Claim. Any stay of this Order pending appeal by any claimant subject to this Order shall only apply to the contested matter that involves such claimant and shall not act to stay the applicability or finality of this Order with respect to the other contested matters covered hereby.

7. The Trust's claims agent is authorized and directed to modify the Claims Register in accordance with entry of the relief granted in this Order.

8. Nothing in this Order shall affect the Trust's right to object to the Remaining Claims or any other Proofs of Claim at a future date on any basis.

9. Notwithstanding the relief granted in this Order and any actions taken pursuant to such relief, nothing in this Order shall be deemed: (a) an admission as to the validity, priority, or amount of any particular claim; (b) a waiver of the Trust's right to dispute any particular claim on any grounds; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order or the Objection; (e) a request or

authorization to assume any agreement, contract, or lease pursuant to section 365 of the Bankruptcy Code; or (f) a waiver or limitation of the Trust's rights under the Bankruptcy Code or any other applicable law. Any payment made pursuant to this Order should not be construed as an admission as to the validity, priority, or amount of any particular claim or a waiver of the Trust's right to subsequently dispute such claim.

10. The Trust is authorized to take all actions necessary to effectuate the relief granted in this Order in accordance with the Objection.

11. This Court retains exclusive jurisdiction with respect to all matters arising from or related to the implementation, interpretation, and enforcement of this Order.

**Schedule 1**  
Amended Claims

Claim to be Disallowed						Remaining Claim						Reasoning for Objection
Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	
1 Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		169	3/1/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$529,299.97 General Unsecured: \$2,179.52  Total: \$531,479.49	Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		392	12/27/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$529,299.97 General Unsecured: \$2,179.52  Total: \$531,479.49	Amended Claim
2 Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		27	12/3/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$625,915.90 General Unsecured: \$192,676.36  Total: \$818,592.26	Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		392	12/27/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$529,299.97 General Unsecured: \$2,179.52  Total: \$531,479.49	Amended Claim
3 Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		28	12/4/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$509,720.79 General Unsecured: \$0.00  Total: \$509,720.79	Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		392	12/27/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$529,299.97 General Unsecured: \$2,179.52  Total: \$531,479.49	Amended Claim
4 Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		391	12/23/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$194,470.92 General Unsecured: \$0.00  Total: \$194,470.92	Department Of Treasury - Internal Revenue Service	Henry Ford Village, Inc.		392	12/27/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$529,299.97 General Unsecured: \$2,179.52  Total: \$531,479.49	Amended Claim
5 Driven Solutions Inc	Henry Ford Village, Inc.		138	2/16/2021	Administrative: \$67,424.16 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$64,151.26  Total: \$131,575.42	Driven Solutions Inc	Henry Ford Village, Inc.		202	3/8/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$131,575.42  Total: \$131,575.42	Amended Claim
6 Fire Alarm Service Team, LLC	Henry Ford Village, Inc.		55	12/23/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$26,544.00  Total: \$26,544.00	Fire Alarm Service Team, LLC	Henry Ford Village, Inc.		99	2/3/2021	Administrative: \$5,387.50 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$15,402.50  Total: \$20,790.00	Amended Claim
7 Onecare Ltc, LLC	Henry Ford Village, Inc.		44	12/14/2020	Administrative: \$53,777.65 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$694,944.22  Total: \$748,721.87	Onecare Ltc, LLC	Henry Ford Village, Inc.		209	3/9/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$752,081.58  Total: \$752,081.58	Amended Claim
8 Timepayment Corp.	Henry Ford Village, Inc.		30	12/4/2020	Administrative: \$0.00 Secured: \$2,100.00 Priority: \$0.00 General Unsecured: \$11,676.58  Total: \$13,776.58	Timepayment Corp.	Henry Ford Village, Inc.		344	8/19/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$11,676.58  Total: \$11,676.58	Amended Claim
9 VFS LLC	Henry Ford Village, Inc.		158	2/17/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$10,021.09  Total: \$10,021.09	VFS LLC	Henry Ford Village, Inc.		200	3/8/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$92,981.58  Total: \$92,981.58	Amended Claim
<b>TOTALS</b>					<b>\$2,984,902.42</b>						<b>\$3,135,023.12</b>	

**Schedule 2**  
Duplicate Claims

	Claim to be Disallowed						Remaining Claim						Reasoning for Objection
	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	
1		Henry Ford Village, Inc.	2379990			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,205.00 Total: \$4,205.00		Henry Ford Village, Inc.	2378174			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,205.00 Total: \$4,205.00	Duplicate Claim
2	Bewick Publications Inc	Henry Ford Village, Inc.		228	3/30/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$300.00 Total: \$300.00	Bewick Publications Inc	Henry Ford Village, Inc.		183	3/3/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$300.00 Total: \$300.00	Duplicate Claim
3		Henry Ford Village, Inc.	2379987			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,205.00 Total: \$4,205.00		Henry Ford Village, Inc.	2378171			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,205.00 Total: \$4,205.00	Duplicate Claim
4		Henry Ford Village, Inc.	2379989			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,063.00 Total: \$4,063.00		Henry Ford Village, Inc.	2378180			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,063.00 Total: \$4,063.00	Duplicate Claim
5		Henry Ford Village, Inc.	2378187			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$2,802.00 Total: \$2,802.00		Henry Ford Village, Inc.	2379985			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$2,802.00 Total: \$2,802.00	Duplicate Claim
6		Henry Ford Village, Inc.	2378190			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,082.00 Total: \$4,082.00		Henry Ford Village, Inc.	2379998			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,082.00 Total: \$4,082.00	Duplicate Claim
7		Henry Ford Village, Inc.	2378203			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,083.00 Total: \$3,083.00		Henry Ford Village, Inc.	2379999			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,083.00 Total: \$3,083.00	Duplicate Claim
8		Henry Ford Village, Inc.	2378201			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,083.00 Total: \$3,083.00		Henry Ford Village, Inc.	2379997			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,083.00 Total: \$3,083.00	Duplicate Claim
9		Henry Ford Village, Inc.	2378197			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,419.00 Total: \$3,419.00		Henry Ford Village, Inc.	2379992			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,419.00 Total: \$3,419.00	Duplicate Claim
10		Henry Ford Village, Inc.	2380016			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,483.00 Total: \$4,483.00		Henry Ford Village, Inc.	2378191			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,483.00 Total: \$4,483.00	Duplicate Claim

**Schedule 2**  
Duplicate Claims

	Claim to be Disallowed						Remaining Claim						Reasoning for Objection
	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	
11		Henry Ford Village, Inc.	2380008			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,373.00  Total: \$4,373.00		Henry Ford Village, Inc.	2378208			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,373.00  Total: \$4,373.00	Duplicate Claim
12		Henry Ford Village, Inc.	2380007			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,082.00  Total: \$4,082.00		Henry Ford Village, Inc.	2378200			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,082.00  Total: \$4,082.00	Duplicate Claim
13		Henry Ford Village, Inc.	2380004			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$165,000.00  Total: \$165,000.00		Henry Ford Village, Inc.	2378213			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$165,000.00  Total: \$165,000.00	Duplicate Claim
14		Henry Ford Village, Inc.		230	3/31/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$629.58  Total: \$629.58		Henry Ford Village, Inc.		100	2/3/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$629.58  Total: \$629.58	Duplicate Claim
15		Henry Ford Village, Inc.	2380017			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,373.00  Total: \$4,373.00		Henry Ford Village, Inc.	2378220			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,373.00  Total: \$4,373.00	Duplicate Claim
16		Henry Ford Village, Inc.	2380038			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,205.00  Total: \$4,205.00		Henry Ford Village, Inc.	2378240			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,205.00  Total: \$4,205.00	Duplicate Claim
17	Michigan Department Of Health And Human Services	Henry Ford Village, Inc.		346	9/3/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$13,959.33  Total: \$13,959.33	Michigan Department Of Health And Human Services	Henry Ford Village, Inc.		348	9/3/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$13,959.33  Total: \$13,959.33	Duplicate Claim
18	Michigan Filter & Fleet Supply	Henry Ford Village, Inc.		239	4/2/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$209.55  Total: \$209.55	Michigan Filter & Fleet Supply	Henry Ford Village, Inc.		101	2/3/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$209.55  Total: \$209.55	Duplicate Claim
19		Henry Ford Village, Inc.	2380035			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,483.00  Total: \$4,483.00		Henry Ford Village, Inc.	2378230			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,483.00  Total: \$4,483.00	Duplicate Claim
20		Henry Ford Village, Inc.	2378235			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,963.00  Total: \$3,963.00		Henry Ford Village, Inc.	2379977			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,963.00  Total: \$3,963.00	Duplicate Claim

**Schedule 2**  
Duplicate Claims

	Claim to be Disallowed						Remaining Claim						Reasoning for Objection
	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Claim Amounts	
21		Henry Ford Village, Inc.	2380028			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,963.00 Total: \$3,963.00		Henry Ford Village, Inc.	2378221			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,963.00 Total: \$3,963.00	Duplicate Claim
22	Services To Enhance Potential	Henry Ford Village, Inc.		237	4/6/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$2,969.03 Total: \$2,969.03	Services To Enhance Potential	Henry Ford Village, Inc.		163	2/25/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$2,969.03 Total: \$2,969.03	Duplicate Claim
23		Henry Ford Village, Inc.	2380036			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,209.00 Total: \$4,209.00		Henry Ford Village, Inc.	2378236			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$4,209.00 Total: \$4,209.00	Duplicate Claim
24		Henry Ford Village, Inc.	2377995			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$76,000.00 Total: \$76,000.00		Henry Ford Village, Inc.		418	2/1/2022	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$76,000.00 Total: \$76,000.00	Duplicate Claim
25	Sofel Worx Dba Auto Accessories Usa	Henry Ford Village, Inc.		24	12/8/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$920.00 Total: \$920.00	Auto Accessories Usa Inc	Henry Ford Village, Inc.		119	2/10/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$920.00 Total: \$920.00	Duplicate Claim
26		Henry Ford Village, Inc.	2380037			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,362.00 Total: \$3,362.00		Henry Ford Village, Inc.	2378234			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,362.00 Total: \$3,362.00	Duplicate Claim
27	William Beaumont Hospital	Henry Ford Village, Inc.		304	4/21/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$39,284.54 Total: \$39,284.54	William Beaumont Hospital	Henry Ford Village, Inc.		324	4/26/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$39,284.54 Total: \$39,284.54	Duplicate Claim
28	William Beaumont Hospital	Henry Ford Village, Inc.		302	4/21/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$39,284.54 Total: \$39,284.54	William Beaumont Hospital	Henry Ford Village, Inc.		324	4/26/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$39,284.54 Total: \$39,284.54	Duplicate Claim
<b>TOTALS</b>						<b>\$408,994.57</b>							<b>\$408,994.57</b>

**Schedule 3**  
No Liability Claims

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
1	Auto-Owners Insurance Company	Henry Ford Village, Inc.		210		Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$114,670.00  Total: \$114,670.00	Disallow & Expunge	No Liability - Executed Addendum
2	[REDACTED]	Henry Ford Village, Inc.	2379439			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$81,776.03  Total: \$81,776.03	Disallow & Expunge	No Liability - LARA
3	[REDACTED]	Henry Ford Village, Inc.	2379437			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$145,916.39  Total: \$145,916.39	Disallow & Expunge	No Liability - LARA
4	[REDACTED]	Henry Ford Village, Inc.		384	12/23/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$42,000.00  Total: \$42,000.00	Disallow & Expunge	No Liability - Executed Addendum
5	[REDACTED]	Henry Ford Village, Inc.	2379457			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$200,369.04  Total: \$200,369.04	Disallow & Expunge	No Liability - LARA
6	[REDACTED]	Henry Ford Village, Inc.		211	3/8/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$35,330.00  Total: \$35,330.00	Disallow & Expunge	No Liability - Executed Addendum

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
7		Henry Ford Village, Inc.		381	12/17/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$172,575.00  Total: \$172,575.00	Disallow & Expunge	No Liability - Executed Addendum
8		Henry Ford Village, Inc.	2379496			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$67,298.79  Total: \$67,298.79	Disallow & Expunge	No Liability - LARA
9		Henry Ford Village, Inc.		373	12/13/2021	Administrative: \$0.00 Secured: \$75,000.00 Priority: \$19,225.35 General Unsecured: \$0.00  Total: \$94,225.35	Disallow & Expunge	No Liability - Executed Addendum
10		Henry Ford Village, Inc.		415	1/3/2022	Administrative: \$0.00 Secured: \$0.00 Priority: \$1,214.59 General Unsecured: \$0.00  Total: \$1,214.59	Disallow & Expunge	No Liability - Executed Addendum
11		Henry Ford Village, Inc.	2379495			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$69,772.68  Total: \$69,772.68	Disallow & Expunge	No Liability - LARA
12		Henry Ford Village, Inc.		14	11/25/2020	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$141,000.00  Total: \$141,000.00	Disallow & Expunge	No Liability - Executed Addendum

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
13	Dearborn Country Club	Henry Ford Village, Inc.	2377815			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$2,592.88  Total: \$2,592.88	Disallow & Expunge	No Liability - Satisfied by Cure
14		Henry Ford Village, Inc.		372	12/13/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$100,000.00  Total: \$100,000.00	Disallow & Expunge	No Liability - Executed Addendum
15		Henry Ford Village, Inc.	2379552			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$54,817.40  Total: \$54,817.40	Disallow & Expunge	No Liability - LARA
16		Henry Ford Village, Inc.		413	1/16/2022	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$199,500.00  Total: \$199,500.00	Disallow & Expunge	No Liability - Executed Addendum
17		Henry Ford Village, Inc.	2379596			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$79,812.99  Total: \$79,812.99	Disallow & Expunge	No Liability - LARA
18		Henry Ford Village, Inc.	2380011			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$3,264.00  Total: \$3,264.00	Disallow & Expunge	No Liability - LARA

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
19		Henry Ford Village, Inc.		184	3/3/2021	Administrative: \$0.00 Secured: \$78,000.00 Priority: \$0.00 General Unsecured: \$0.00  Total: \$78,000.00	Disallow & Expunge	No Liability - Executed Addendum
20		Henry Ford Village, Inc.		394	12/29/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$78,000.00 General Unsecured: \$0.00  Total: \$78,000.00	Disallow & Expunge	No Liability - Executed Addendum
21		Henry Ford Village, Inc.		285	4/19/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$3,025.00 General Unsecured: \$222,975.00  Total: \$226,000.00	Disallow & Expunge	No Liability - Executed Addendum
22		Henry Ford Village, Inc.		286	4/19/2021	Administrative: \$0.00 Secured: \$270,000.00 Priority: \$3,025.00 General Unsecured: \$0.00  Total: \$273,025.00	Disallow & Expunge	No Liability - Executed Addendum
23		Henry Ford Village, Inc.	2379677			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$170,768.45  Total: \$170,768.45	Disallow & Expunge	No Liability - LARA
24		Henry Ford Village, Inc.		414	1/19/2022	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$130,000.00  Total: \$130,000.00	Disallow & Expunge	No Liability - Executed Addendum

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
25		Henry Ford Village, Inc.	2379716			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$49,462.33  Total: \$49,462.33	Disallow & Expunge	No Liability - LARA
26		Henry Ford Village, Inc.		186	3/3/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$3,025.00 General Unsecured: \$85,975.00  Total: \$89,000.00	Disallow & Expunge	No Liability - Executed Addendum
27		Henry Ford Village, Inc.	2379675			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$58,448.90  Total: \$58,448.90	Disallow & Expunge	No Liability - LARA
28		Henry Ford Village, Inc.	2379727			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$96,822.00  Total: \$96,822.00	Disallow & Expunge	No Liability - LARA
29		Henry Ford Village, Inc.		252	4/12/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$150,000.00  Total: \$150,000.00	Disallow & Expunge	No Liability - Executed Addendum
30		Henry Ford Village, Inc.		294	4/21/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$65,625.00  Total: \$65,625.00	Disallow & Expunge	No Liability - Executed Addendum

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
31		Henry Ford Village, Inc.	2379717			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00  Total: \$0.00	Disallow & Expunge	No Liability - Executed Addendum
32		Henry Ford Village, Inc.	2379708			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00  Total: \$0.00	Disallow & Expunge	No Liability - Executed Addendum
33		Henry Ford Village, Inc.		409	1/7/2022	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$105,000.00  Total: \$105,000.00	Disallow & Expunge	No Liability - Executed Addendum
34		Henry Ford Village, Inc.	2379865			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$172,031.05  Total: \$172,031.05	Disallow & Expunge	No Liability - LARA
35		Henry Ford Village, Inc.		360	11/10/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$172,332.93  Total: \$172,332.93	Disallow & Expunge	No Liability - LARA
36		Henry Ford Village, Inc.		69		Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$509,127.83  Total: \$509,127.83	Disallow & Expunge	No Liability – Insufficient Documentation

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
37	Pitney Bowes Global Financial Services LLC	Henry Ford Village, Inc.		369		Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$5,069.17  Total: \$5,069.17	Disallow & Expunge	No Liability – Insufficient Documentation
38	[REDACTED]	Henry Ford Village, Inc.	2379836			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00  Total: \$0.00	Disallow & Expunge	No Liability - Executed Addendum
39	[REDACTED]	Henry Ford Village, Inc.		303	4/21/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$204,000.00  Total: \$204,000.00	Disallow & Expunge	No Liability - Executed Addendum
40	[REDACTED]	Henry Ford Village, Inc.		404	1/5/2022	Administrative: \$123,000.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00  Total: \$123,000.00	Disallow & Expunge	No Liability - Executed Addendum
41	[REDACTED]	Henry Ford Village, Inc.	2379817			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00  Total: \$0.00	Disallow & Expunge	No Liability - Executed Addendum
42	[REDACTED]	Henry Ford Village, Inc.	2379979			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$86,357.00  Total: \$86,357.00	Disallow & Expunge	No Liability - LARA

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
43		Henry Ford Village, Inc.		354	10/26/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$90,000.00  Total: \$90,000.00	Disallow & Expunge	No Liability - LARA
44		Henry Ford Village, Inc.		368	11/29/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$89,000.00  Total: \$89,000.00	Disallow & Expunge	No Liability - LARA
45		Henry Ford Village, Inc.	2379642			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$147,325.07  Total: \$147,325.07	Disallow & Expunge	No Liability - LARA
46		Henry Ford Village, Inc.		253	4/12/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$153,800.00  Total: \$153,800.00	Disallow & Expunge	No Liability - LARA
47		Henry Ford Village, Inc.		254	4/12/2021	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$153,850.00  Total: \$153,850.00	Disallow & Expunge	No Liability - LARA
48		Henry Ford Village, Inc.		255	4/12/2021	Administrative: \$0.00 Secured: \$153,800.00 Priority: \$0.00 General Unsecured: \$50.00  Total: \$153,850.00	Disallow & Expunge	No Liability - LARA

**Schedule 3**  
**No Liability Claims**

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
49		Henry Ford Village, Inc.	2379928			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$107,001.75  Total: \$107,001.75	Disallow & Expunge	No Liability - LARA
50		Henry Ford Village, Inc.	2379920			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$60,343.83  Total: \$60,343.83	Disallow & Expunge	No Liability - LARA
51		Henry Ford Village, Inc.	2379922			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$96,558.41  Total: \$96,558.41	Disallow & Expunge	No Liability - LARA
52		Henry Ford Village, Inc.		401	1/3/2022	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$0.00  Total: \$0.00	Disallow & Expunge	No Liability - Executed Addendum
53		Henry Ford Village, Inc.		402	1/4/2022	Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$240,750.00  Total: \$240,750.00	Disallow & Expunge	No Liability - Executed Addendum
54		Henry Ford Village, Inc.	2379944			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$216,345.21  Total: \$216,345.21	Disallow & Expunge	No Liability - LARA

**Schedule 3**  
No Liability Claims

	Name of Claimant	Debtor Name	Schedule #	Claim #	Date Filed	Current Claim Amounts	Proposed Treatment	Reason for Objection
55		Henry Ford Village, Inc.	2379950			Administrative: \$0.00 Secured: \$0.00 Priority: \$0.00 General Unsecured: \$76,993.70  Total: \$76,993.70	Disallow & Expunge	No Liability - LARA
<b>TOTALS</b>						<b>\$6,034,022.77</b>		

**Exhibit B**

**Notice of Hearing on First Omnibus Objection to Claims**

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

IN RE:

Case No. 20-51066-mar

HFV LIQUIDATING TRUST,

Chapter 11

Debtor.

Honorable Mark A. Randon

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**NOTICE OF THE HFV LIQUIDATING TRUST'S  
FIRST OMNIBUS OBJECTION TO CLAIMS**

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On June 6, 2022, the HFV Liquidating Trust (collectively, the “Trust”)<sup>1</sup> filed the *First Omnibus Objection of The HFV Liquidating Trust to (A) Amended or Superseded Claims, (B) Duplicate Claims, and (C), Certain No Liability Claims* [Docket No. 779] (the “First Omnibus Objection”) with the Court attached hereto as **Exhibit 1**. By the First Omnibus Objection, the Trust is objecting to certain claims, including the claim(s) described on **Exhibit 2**.

**Your claim may be reduced, modified, or disallowed. You should read these papers carefully and discuss them with your attorney, if you have one.**

If you do not want the court to disallow or modify your claim, then on or before (the “Objection Deadline”), you or your lawyer must:

1. File a written response (a “Response”) to the objection, explaining your position. Your Response must be sent to:

<b>U.S. Bankruptcy Court</b>
Eastern District of Michigan 211 West Fort Street Courtroom 1825 Detroit, MI 48226

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<sup>1</sup> Capitalized terms used but not otherwise defined herein shall have the meanings set forth in the Objection.

<b>Counsel to the HFV Liquidating Trust</b>	
<b>PERKINS COIE LLP</b> Eric E. Walker, IL Bar No. 6290993 Kathleen M. Allare, IL Bar No. 6326536 110 North Wacker, Suite 3400 Chicago, IL 60606 EWalker@perkinscoie.com Kallare@perkinscoie.com	<b>HOWARD &amp; HOWARD ATTORNEYS PLLC</b> James E. Morgan (Fed. Id. No. 90785074) 450 West Fourth Street Royal Oak, Michigan 47067-2557 <a href="mailto:jem@h2law.com">jem@h2law.com</a>
<b>Counsel to United States Trustee</b>	
Leslie K. Berg 211 West Fort St., Suite 700 Detroit, MI 48226 Leslie.K.Berg@usdoj.gov	

If you mail your Response to the Court for filing, you must mail it early enough so that it will be **received** on or before the Objection Deadline stated above. All attorneys are required to file pleadings electronically.

A Response should include the below information:

- A. a caption setting forth the name of the Court, the name of the Trust, the case number, and the title of the First Omnibus Objection to which the Response is directed;
- B. the claimant's name and an explanation for the amount of the Claim;
- C. a concise statement setting forth the reasons why the Court should not sustain the First Omnibus Objection, including, without limitation, the specific factual and legal bases upon which the claimant will rely in opposing the First Omnibus Objection;
- D. a copy of any other documentation or other evidence of the Claim, to the extent not already included with the Claim, upon which the claimant will rely in opposing the First Omnibus Objection at the hearing; and

- E. the claimant's name, address, telephone number, and email address and/or the name, address, telephone number and email address of the claimant's attorney and/or designated representative to whom the attorneys for the Trust should serve a reply to the Response, if any (collectively, the "Notice Addresses"). If a Response contains Notice Addresses that are different from the name and/or address listed on the Claim, the Notice Addresses will control and will become the service address for future service of papers with respect to all of the claimant's Claims listed in the First Omnibus Objection (including all Claims to be disallowed and expunged and the surviving Claims).

2. Attend the hearing on the objection, scheduled to be held on **July 20, 2022, at 10:00 a.m.** in Courtroom 1825, United States Bankruptcy Court, 211 West Fort St., Detroit, MI, unless your attendance is excused by mutual agreement between yourself and the objector's attorney.

Judge Randon is conducting all conferences and non-evidentiary hearings by telephone. At least five minutes prior to the scheduled hearing, counsel and parties should call 1-888-363-4734 and use Access Code 2795304. Please place phone on mute and wait until your case is called. Once your case is called, please unmute your phone and participate.

Unless the matter is disposed of summarily as a matter of law, the hearing shall be a pre-trial conference only; neither testimony nor other evidence will be received. A pre-trial scheduling order may be issued as a result of the pre-trial conference.

**If you or your attorney do not take these steps, the Court may deem that you do not oppose the objection to your claim, in which event the hearing will be canceled, and the objection sustained.**

If you have any questions regarding the First Omnibus Objection and/or if you wish to obtain a copy of the First Omnibus Objection or related documents, you may call the Trust's claims agent at (866) 223-7306. You may also obtain a copy of the First Omnibus Objection or related documents by visiting the Trust's restructuring website at [www.cases.stretto.com/hfv/](http://www.cases.stretto.com/hfv/).

Dated: June 6, 2022

By: /s/ Eric E. Walker

**PERKINS COIE LLP**

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-and-

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*Counsel for HFV Liquidating Trust*